

May 13, 2015

Ms. Charlotte F. TerKeurst  
Program Manager, ESRB, CPUC  
California Public Utilities Commission  
505 Van Ness Boulevard  
San Francisco, CA 94102

Subject: Response to Safety and Enforcement Division (SED), 2015 Electric Audit Report of PG&E's Transmission Line Eureka Headquarters; CPUC ID: TA2015-001.

Dear Ms. TerKeurst:

From February 23-25, 2015, your staff conducted a records and field audit of PG&E's Eureka Transmission Line Headquarters. The records portion of the audit included a review of pre-audit data request responses and additional records that were provided during the audit. The field portion of the audit included the CPUC visiting 15 locations on five transmission circuits.

The SED submitted the audit summary to PG&E on April 13, 2015 which contained two alleged violations:

- A. GO 165, Section IV, and GO 95, Rule 31.1; and
- B. GO 165, Section IV, GO 95, Rule 56.7-B, and GO 95, Rule 31.1.

The audit summary letter requested that PG&E advise the SED no later than May 13, 2015, of all corrective measures taken by PG&E to remedy and prevent such violations. Section I (below) lists PG&E's response and corrective actions taken or planned to address both items.

Please contact me at 415-973-7544 if you have any questions regarding this response.

Sincerely,

/x/

Eric Back

Director, Electric Compliance and Risk Management

cc: Ms. Elizaveta Malashenko, Director, SED, CPUC  
Mr. Fadi Daye, P.E., Program and Project Supervisor, SED, CPUC  
Mr. Alok Kumar, P.E., Senior Utilities Engineer, Supervisor, SED, CPUC  
Mr. Raymond Cho, Utilities Engineer, SED, CPUC

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The format used in PG&E's response is to copy (in black text) the SED's allegation, using the SED's format, followed by PG&E's response in blue font.

### Violation(s)

A.	<b>Location:</b>	PG&E – Eureka Headquarters
	<b>Date Visited by CPUC:</b>	2/23/2015 – 2/25/2015
	<b>Explanation of Violation(s):</b>	
	<b><u>Late Work Orders</u></b>  GO 165, Section IV, Transmission Facilities, states in part:  <i>Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.</i>  GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:  <i>Electric supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.</i> <i>For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.</i>  CPUC staff found 60 PG&E work orders complete past their due dates and 55 pending work orders that past their due dates.  PG&E Response: As part of PG&E's ongoing effort to improve its risk-based maintenance and work execution strategy <sup>1</sup> , PG&E discontinued reassessing Electric Transmission Line notifications.  Prior to October 1, 2013, Electric Transmission Line notifications had been created when abnormal conditions were identified during patrols and inspections, even a condition that did not impact or have the potential to adversely impact, safety or service reliability. Many times these notifications were reassessed (due to their non-safety related nature) and the due dates were extended.  PG&E stopped reassessing all Electric Transmission Line notifications created prior to October 1, 2013 and developed a plan to address the existing notifications. Similar to its Electric Distribution approach, which involved the successful elimination of both reassessments and a backlog of existing notifications, PG&E used the terms backlog and steady state according to the following criteria: <ul style="list-style-type: none"><li>• Steady-state: All Electric Transmission Line notifications created on or after 10/1/2013. All steady-state notifications are to be completed by the required end date. Any steady-state notifications that are not completed by the required end date are considered "past due".</li></ul>	

<sup>1</sup> PG&E's risk-based strategy included the implementation of a portfolio assessment based on safety and customer reliability factors.

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PG&E is committed to complete all steady-state notifications by their due date.

- Backlog: All Electric Transmission Line notifications created prior to 10/1/2013. Backlog notifications are to be prioritized and completed in a timely manner based on considerations of public safety and system reliability. Typically, backlog notifications will be bundled and scheduled with high priority work. PG&E is on track to complete its Electric Transmission Line backlog notifications by no later than 12/31/2017.

PG&E will set up a meeting with SED staff to share its backlog mitigation plan and answer any questions the SED may have with that program.

PG&E would like to clarify an error in the CPUC's finding. In response to CPUC pre-audit data requests DR 7 and DR 8<sup>2</sup>, PG&E provided two files:

- File 1 (DR 7 Circuits with Completed Notifications.xlsx) contains 535 lines of data (excluding the header row) and listing all notifications completed in the last year. A review of that data finds 59 notifications (not 60) that were completed past the end date listed in SAP. All 59 were backlog; none were steady state.
- File 2 (DR 7 Circuits with Pending Notifications.xlsx) contains 91 lines of data (excluding the header row) listing all pending notifications at the time the data were gathered in response to the CPUC pre-audit request. A review of that data finds 36 were not past due as of the date the data was gathered and 55 were open and past the end date listed in SAP. All 55 are backlog; none are steady state.

PG&E's handling of steady-state notification and its backlog mitigation plan is intended to eliminate reassessing work, eliminate a backlog of work and improve the safety and reliability of our system.

Based on public safety and system reliability, PG&E continues to prioritize and will complete the pending 55 backlog notifications as part of its backlog mitigation plan.

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<sup>2</sup> Pre-audit data request DR 7: "Provide a list of work pending and work completed in the last year." Pre-audit data request DR 8: "Provide a list of late work orders in the last year." The two files PG&E provided for DR 7 satisfied both DR 7 and DR 8.

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<b>B.</b>	<b>Circuit:</b> Arcata – Humboldt
	<b>Structure No.:</b> 7/7
	<b>Previous Visit by PG&amp;E:</b> 3/21/14
	<b>Date Visited by CPUC:</b> 2/24/15
	<b>Explanation of Violation(s):</b>
	<p><b><u>Damaged Guy Guard and Guy Wire Contact Above Insulator</u></b></p> <p>GO 165, Section IV, Transmission Facilities, states in part:</p> <p style="padding-left: 40px;"><i>Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.</i></p> <p>GO 95, Rule 56.7-B, Anchor Guys, states in part:</p> <p style="padding-left: 40px;"><i>In order to prevent trees, buildings, messengers, metal-sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by the Rule.</i></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="padding-left: 40px;"><i>Electric supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service. For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.</i></p> <p>The guy guard was damaged and vegetation was in contact with the guy wire above the insulator.</p>
	<p>PG&amp;E Response: On Thursday, February 26, 2015, at 11:09 AM, Ms. Yoko Williams sent an email message to Mr. Raymond Cho letting him know that PG&amp;E cleared the vegetation from touching the guy wires above the insulators and that the damaged guy guard had been replaced. Please see the photos attached below showing the completed work.</p> <p>To prevent recurrence, the Transmission Line supervisor in Humboldt conducted a tailboard with crew members who perform patrols and inspections to reinforce the requirements to identify vegetation touching guy wires above the insulator and also damaged guy guards and the steps that need to be taken to mitigate such items.</p>

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